

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case No. 1:11-CV-150
	)	
vs.	)	
	)	
	)	
MICHAEL HERZBERG,	)	
	)	
Defendant.	)	

**MOTION TO COMPEL POST-JUDGMENT DISCOVERY**

The United States of America, by and through William C. Killian, United States Attorney for the Eastern District of Tennessee, moves the Court pursuant to Rules 37 and 69, Federal Rules of Civil Procedure, for an order compelling Defendant to respond to post-judgment discovery requests served on Defendant on April 13, 2012, for an award of the reasonable expenses incurred by the United States in connection with such motion. In support of this motion, the United States submits a declaration of movant's counsel and a supporting memorandum.

Respectfully submitted,

WILLIAM C. KILLIAN  
UNITED STATES ATTORNEY

By: *s/Suzanne H. Bauknight*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 16, 2012, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system. A copy was sent by regular U.S. Mail to:

Michael Herzberg  
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Hixson, TN 37343

*s/Suzanne H. Bauknight*  
Suzanne H. Bauknight  
Assistant United States Attorney